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11 **UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

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13 AMERICAN CIVIL LIBERTIES
14 UNION FOUNDATION OF
SOUTHERN CALIFORNIA,
15 *Plaintiff,*

16 v.
17 UNITED STATES IMMIGRATION
18 AND CUSTOMS ENFORCEMENT,
et al.,
19 *Defendants.*

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21 Case No. 2:22-CV-04760-SHK
22
23 **JOINT STIPULATION TO SET
24 BRIEFING SCHEDULE FOR
CROSS-MOTIONS FOR
25 SUMMARY JUDGMENT AGAINST
DEFENDANT U. S. IMMIGRATION
AND CUSTOMS ENFORCEMENT**
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Honorable Shashi H. Kewalramani
United States Magistrate Judge

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1 IT IS HEREBY STIPULATED, by and between Plaintiff American Civil
2 Liberties Union Foundation of Southern California and Defendant U.S. Immigration
3 and Customs Enforcement (“ICE”), through their counsel, and subject to an order of
4 this Court as follows:

5 1. On January 17, 2025 by telephone, and through email communication,
6 the Parties met and conferred pursuant to Local Rule 7-3 to discuss their intent to file
7 Cross-Motions for Summary Judgment as to Plaintiff against Defendant ICE.

8 2. During the Rule 7-3 conference and communications, ICE confirmed
9 that it would complete its production of records responsive to Plaintiff’s Freedom of
10 Information (“FOIA”) request on or about January 22, 2025. Plaintiff stated that it
11 intends to file a Motion for Summary Judgment against ICE regarding its claims of
12 search adequacy, and a second Motion for Summary Judgment against ICE regarding
13 its wrongful withholding of documents, and improper redactions. Defendant ICE
14 stated that it intends to file Cross-Motions for Summary Judgment as to all of
15 Plaintiff’s claims.

16 3. In addition to the content of the Motions, the Parties have discussed the
17 timing of filing their Cross-Motions, and proposals for a briefing schedule. They also
18 discussed the deadline for ICE to produce a search summary to address Plaintiff’s
19 search adequacy claim and a *Vaughn* Index to address Plaintiff’s wrongful
20 withholding claim to facilitate the briefing. This search summary shall include dates
21 of searches, all search terms used, custodians and file locations searched, and the
22 number of pages produced by ICE.

23 4. Although a *Vaughn* index must address “each withheld document or
24 deletion from a released document,” Plaintiff will provide a list of documents to be
25 addressed in ICE’s *Vaughn* index to expedite the process. *Founding Church of*
26 *Scientology of Washington, D.C., Inc. v. Bell*, 603 F.2d 945, 949 (D.C. Cir. 1979).

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1 5. Based on these discussions, the Parties stipulate and agree, subject to an
2 order of this Court, to the following schedule for the Parties to file and brief Cross-
3 Motions for Summary Judgment, and for Defendant ICE to produce a search
4 summary and *Vaughn* index.

Search Adequacy MSJ

- January 22, 2025: ICE completes its production of documents
- February 19, 2025: ICE produces search summary to Plaintiff
- February 26, 2025: Plaintiff files Motion for Summary Judgment on search adequacy
- March 19, 2025: Defendant files Cross Motion for Summary Judgment and Opposition Brief on search adequacy
- April 9, 2025: Plaintiff files Opposition and Reply Brief on search adequacy
- April 23, 2025: Defendant files Reply Brief on search adequacy
- May 7, 2025, or a date thereafter at the convenience of the Court: Hearing on Cross-Motions

Exemption/Withholding MSJ

- January 22, 2025: ICE completes its production of documents
- January 29, 2025: Plaintiff provides list of items to ICE for *Vaughn* index
- March 19, 2025: ICE produces *Vaughn* Index to Plaintiff
- April 30, 2025: If necessary, Plaintiff files Motion for Summary Judgment on withholding and improper redactions
- May 21, 2025: ICE files Cross Motion for Summary Judgment and Opposition Brief
- June 11, 2025: Plaintiff files Opposition and Reply Briefs
- June 25, 2025: ICE files Reply Brief

1 • July 9, 2025, or a date thereafter at the convenience of the Court: Hearing
2 on Cross-Motions
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4 **IT IS SO STIPULATED.**

5 Respectfully submitted this 21st day of January 2025.

6 /S/ Laboni A. Hoq
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7 *Pursuant to Local Rule 5-4.3.4(2)(i), the filer attests that all other signatories
8 listed, and on whose behalf the filing is submitted, concur in the filing's content and
have authorized the filing.

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